

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
(Philadelphia)**

MICHELE M. BURNS

Plaintiff,

v.

FORD MOTOR CREDIT COMPANY,
LLC, TRANS UNION, LLC, EQUIFAX
INFORMATION SERVICES, LLC and
MICHAEL J. BURNS

Defendants.

Civil Action No. 2:19-cv-01647-RBS

NOTICE OF MOTION *IN LIMINE*

TO: Mark A. DiAntonio, Esquire
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PLEASE TAKE NOTICE that Defendant Ford Motor Credit Company LLC will move this Court, before the Honorable R. Barclay Surrick, Senior United States District Judge, at the United States District Court for the Eastern District of Pennsylvania, James A. Bryne U.S. Courthouse 601 Market Street, Room 8614, Philadelphia, Pennsylvania 19106, on a date and time to be determined by the Court, for an Order, pursuant to Federal Rules of Evidence 401 and 403, precluding the introduction or presentation of any and all evidence, testimony, questions, arguments, or references to testimony as it relates to Plaintiff's claim of punitive damages.

In support of this motion, Defendants rely upon the accompanying memorandum of law and all of the pleadings, records and papers filed herein.

Dated: September 8, 2021

WONG FLEMING

By: /s/ Dafney Dubuisson Stokes

Dafney Dubuisson Stokes, Esq.

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